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Attorneys for Defendants BAM Trading Services Inc. and Brian Shroder

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JEFFREY LOCKHART, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

BAM TRADING SERVICES INC. and
BRIAN SHRODER

Defendants.

| Case No. 3:22-cv-03461-JSC

**STIPULATION TO CONTINUE INITIAL
CASE MANAGEMENT CONFERENCE
AND RELATED DEADLINES PURSUANT
TO LOCAL RULE 6-2**

Judge: Hon. Jacqueline Scott Corley
Ctrm.: 8

Trial Date: None set

This stipulation and proposed order is entered into by and between plaintiff Jeffrey Lockhart (“Plaintiff”) and defendants BAM Trading Services Inc. (“BAM” and Brian Shroder (“Shroder”) (collectively “Defendants”) by and through their undersigned counsel of record. The parties stipulate as follows:

WHEREAS, Plaintiff commenced this action by filing a complaint (“Complaint”) on or about June 13, 2022;

WHEREAS, this Court issued an Order Setting Initial Case Management Conference and ADR Deadlines on June 16, 2022, amended on June 17, 2022, designating the following deadlines:

- 8/25/2022, last day to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan. F.R. Civ. P. 26(f) & ADR L.R.3-5

- 1 • 8/25/2022, last day file ADR Certification signed by Parties and Counsel. Civil L.R . 16-
- 2 8(b) & ADR L.R. 3-5(b)
- 3 • 9/8/2022, last day to file Rule 26(f) Report, complete initial disclosures or state objection
- 4 in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents
- 5 of Joint Case Management Statement (available at www.cand.uscourts.gov) F.R. CivP 26(a)
- 6 (1) Civil L.R . 16-9
- 7 • 9/15/2022. Initial Case Management Conference (CMC) at 1:30 PM in: Courtroom E,
- 8 15th Floor Phillip Burton Federal Building 450 Golden Gate Avenue San Francisco, CA
- 9 94102 Civil L.R . 16-10

10 **WHEREAS**, on July 28, 2022, this Court issued a Notice Continuing the Case Management
 11 Conference until September 16, 2022, ordering the Parties to submit a Joint Case Management
 12 Statement by September 9, 2022;

13 **WHEREAS**, the Parties entered and filed a Joint Stipulation pursuant to Rule 6-1 to extend
 14 Defendants' time to file any responsive pleading or motion in response to the Complaint until at least
 15 thirty (30) days after the Court appoints a lead plaintiff and lead counsel pursuant to 15 U.S.C. § 78u-
 16 4(a)(3)(B) and such lead plaintiff files and serves a consolidated complaint on June 29, 2022;

17 **WHEREAS**, Defendants intend to file a Motion to Compel Arbitration as soon as the
 18 pleadings are settled;

19 **WHEREAS**, the Parties agree that the Initial Case Management Conference and all related
 20 deadlines identified in the Order Setting Initial Case Management Conference and ADR Deadlines
 21 should be continued to conserve the Parties' and judicial resources until at least sixty (60) days after the
 22 Court appoints a lead plaintiff and lead counsel pursuant to 15 U.S.C. § 78u-4(a)(3)(B) and such lead
 23 plaintiff files and serves a consolidated complaint.

24 **WHEREAS**, the Parties have previously stipulated to a single extension of time to respond to
 25 the Complaint.

26 **THEREFORE, IT IS HEREBY STIPUALTED AND AGREED**, by and among the
 27 respective parties hereto, that:

28 ///

1 1. The Initial Case Management Conference and all related deadlines identified in the
2 Order Setting Initial Case Management Conference and ADR Deadlines shall be continued until at
3 least sixty (60) days after the Court appoints a lead plaintiff and lead counsel pursuant to 15 U.S.C. §
4 78u-4(a)(3)(B) and such lead plaintiff files and serves a consolidated complaint.

5
6 Dated: August 23, 2022

HAHN LOESER & PARKS LLP

7
8 By: /s/ Michael J. Gleason
9 Michael J. Gleason
10 Attorney for Defendants BAM Trading Services
11 Inc. and Brian Shroder

Dated: August 23, 2022

ROCHE FREEDMAN LLP

12
13 By: /s/ Kyle Roche
14 Kyle Roche
15 Attorney for Plaintiff Jeffrey Lockhart

16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17 The initial case management conference is continued to Dec. 1 at 1:30 p.m. by Zoom videoconference.

18 DATED: August 24, 2022

19
20 
21 THE HONORABLE JACQUELINE SCOTT CORLEY
22 UNITED STATES DISTRICT JUDGE